

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No.

CR 19-198 JRT

UNITED STATES OF AMERICA,

INFORMATION

Plaintiff,

18 U.S.C. § 641

v.

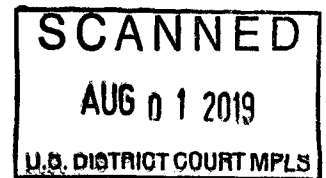
SANDRA KAY MLENEK,

Defendant.

THE UNITED STATES ATTORNEY CHARGES THAT:

BACKGROUND

1. At all relevant times, the Social Security Administration administered a number of federal benefit programs, including retirement benefits. Retirement benefits are monthly benefit payments based on a beneficiary's former earnings record and awarded in order to supplement the earnings lost due to retirement.
2. Otherwise qualified beneficiaries are not eligible to receive Social Security benefits if they are confined in a jail, prison, or another penal institution for more than 30 continuous days due to conviction of a crime.
3. At all relevant times, Defendant **SANDRA KAY MLENEK**'s spouse, L.M., has been ineligible for Social Security benefits due to the fact that he has been continuously incarcerated and serving a life sentence in prison due to conviction of a crime.



U.S. v. Sandra Kay Mlenek

4. Despite knowing L.M. was not entitled to Social Security benefits due to his incarceration, Defendant, **SANDRA KAY MLENEK**, impersonated L.M. on the phone and applied for his Social Security retirement benefits in or around May 2011.

5. Based on her impersonation and misrepresentations, L.M.'s application for retirement benefits was approved by the Social Security Administration. From in or around May 2011 and continuing through in or around November 2017, Defendant, **SANDRA KAY MLENEK**, knowingly received \$66,950.00 in L.M.'s benefits to which she was not entitled.

COUNT 1
(Theft of Government Funds)

6. The United States Attorney incorporates paragraphs 1 through 5 as if fully set forth herein.

7. Beginning in or around May 2011 and continuing through November 2017, in the State and District of Minnesota, Defendant,

SANDRA KAY MLENEK,

did knowingly and willfully embezzle, steal, purloin, and convert to her use money of the Social Security Administration ("SSA"), a department and agency of the United States, to wit: Social Security retirement benefits, in an amount exceeding \$1,000.00, all in violation of Title 18, United States Code, Section 641.

U.S. v. Sandra Kay Mlenek

FORFEITURE ALLEGATIONS

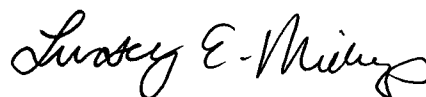
Count 1 of this Information is hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

As a result of the offense alleged in Count 1 of this Information, Defendant shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to the violation of Title 18, United States Code, Section 641.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p) as incorporated by Title 28, United States Code, Section 2461(c).

Dated: July 31, 2019

ERICA H. MacDONALD
United States Attorney



BY: LINDSEY E. MIDDLECAMP
Special Assistant U.S. Attorney
Attorney ID No. 392589